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LAW DEPARTMENT
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June 30, 2021

By ECF

Honorable Colleen McMahon
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

In Re: New York City Policing During Summer 2020 Demonstrations
This document is related to, 20 Civ. 8924

Your Honor:

I am counsel for The City of New York, attorney for defendants in this action. I write with the consent of plaintiffs to request an extension of time to July 8, 2021, to take the deposition of Julian Phillips, a plaintiff in Payne, et al., v. City of New York, et al., 20-cv-8924 (CM) (GWG). The deadline to complete plaintiffs' depositions in the consolidated cases is July 1, 2021. (Dkt. No. 40) (CM). Defendants respectfully submit that this request is necessary, because the attorney originally scheduled to take Mr. Phillips' deposition on Monday, June 21, 2021, had a family medical emergency the weekend before the deposition and was therefore not able to take the deposition. His mother suffered a heart attack. As Plaintiff depositions are scheduled every business day in June through July 1, 2021, it is not possible to reschedule Mr. Phillips' deposition before the July 1, 2021, deadline. Defendants have made no prior requests to extend the time to take plaintiffs' depositions in these consolidated cases. Plaintiffs consent to this request and have consented to taking Mr. Phillips' deposition on July 8, 2021. The requested extension does not affect any other scheduled date.

Thank you for your consideration herein.

Respectfully submitted,

Amy Robinson s/

Amy Robinson
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)